

Comment on Speed of Answer Rule for Video Relay Service  
CG Docket No. 03-123

There are several differences between Video Relay and Text/IP Relay:

First and foremost, VRS requires the use of highly skilled professional Sign Language interpreters in order to handle calls. Text/IP Relay have no such requirement. Therefore the available pool of people from which VRS has to hire and fill needed positions is MUCH SMALLER than that from which Text and IP relay companies may hire from.

Secondly, The Deaf Community in the United States is so thrilled to have Video Relay that most are willing to wait a little longer in order to have a skilled interpreter handle their call, rather than dealing with the frustration of Text/IP CA's, most of whom have no understanding of Deaf Culture, etc.

As Video Relay companies continue to hire QUALIFIED Sign Language interpreters, meaning those certified by either of two certifying bodies, the speed of answer time should drop accordingly.

Reply to each item as numbered:

1a. Speed of answer time should not be set at this time, due to the fact that the hiring of QUALIFIED Sign Language interpreters has not kept up with the call volume. VRS is VERY different from Text Relay. Therefore, if any speed of answer rule is established, it should be LONGER FOR VRS than for Text Relay.

1b. When a Speed of Answer rule is established, it should vary according to call volume or time of day and day of week.

2a. A speed of answer rule for VRS should be established once enough skilled sign language interpreters are in place to handle the call volume.

2b. Speed of answer rule should be phased in over a period of time. For example, if the target is one-minute, perhaps the first phase could be five-minutes for the first six months of the new year, then four minutes from month 6 to month 9, then three minutes from month 10 through the end of the year, and so on, till the target is reached.

3. Speed of answer should be measured from the time the call appears in the individual interpreter's queue.

4. Abandoned calls should not be counted in a provider's speed of answer standard. Why would abandoned calls be included in such a rule??

5. There should be no call-backs, all persons should have to wait on line for the next available CA.

